



Rocky Mountain
Remediation Services, L.L.C.
... protecting the environment

COPY 435

DIRECTIVE

SAFETY AND ENVIRONMENTAL STEWARDSHIP DIRECTIVE

OPS-DIR-001

Revision 2

Date Effective: 08/15/97

APPROVED: Frederic P. H. [Signature] 8/5/97
Sr. Vice President, Operations

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1. PURPOSE

The purpose of this directive is to clarify and communicate Senior Management's commitment to a policy of safety and environmental stewardship and identify the associated responsibilities and performance expectations for conduct of operations. This policy applies to all RMRS employees and sub-contractors.

2. SCOPE

The scope of this directive covers our most important asset our employees. The scope of this directive covers all work efforts associated with RMRS activities that may have impacts on human health and the environment. This directive is applicable to all activities conducted within RMRS Operations by either RMRS employees or sub-contractors.

3. DIRECTIVE

It is the policy of RMRS to conduct its operations in a manner that ensures compliance with all applicable safety and environmental regulations. RMRS believes that all operations can be conducted in a safe and compliant manner. With good planning safety and environmental controls can increase production, as long as they are planned into the operation. No operation's task or performance measure is worth the possibility of injuring any employee or damaging the environment. Our goal is to have a safe workplace first and then meet production targets safely. This commitment extends beyond compliance with regulations, operating permits, and consent orders and therefore includes operating in a manner that is consistent with standard operating procedures. RMRS is fully committed to implementing a program of the highest quality to ensure that operations are consistently implemented in a compliant and responsible manner.

Each worker should understand that an integral part of their daily duties is to ensure operations are conducted in accordance with this stewardship policy. Additionally, each worker has the right and obligation to stop work without repercussions if the possibility exists that they or a coworker will be injured or the environment will be damaged.

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

It is the intent of RMRS to:

1. Review all activities to identify safety and environmental aspects and applicable regulations. All hazards identified in these reviews will be documented in AHA's as well as any actions to mitigate the hazards or reduce risks.
2. Establish safety and environmental objectives and targets in accordance with the policy of safety and environmental stewardship.
3. Maintain a superior housekeeping program, as good housekeeping is the corner stone of any safety program.
4. All accidents are preventable and the extent of injury is a matter of luck. Therefore RMRS will investigate and document all near misses as well as accidents. Accident investigations will be focused on preventing reoccurrence, not fault finding or to place blame.
5. Meet all commitments made to the regulatory community promptly and fully supported with written documentation.
6. Hold management ultimately responsible for compliant activities in the operations that are under their direct responsibility.
7. Maintain a qualified safety and environmental compliance organization that as a minimum, provides sound technical support and advice to each operational area.
8. Foster creative thinking that supports necessary, sufficient, and stringent compliance with all regulatory requirements.
9. Evaluate operations to determine the compliance status before, during, and after the operation as well as make necessary adjustments to assure compliance.
10. Conduct training in safety and environmental regulations and procedures for RMRS employees to enhance their understanding of the requirements and methods to achieve compliance.
11. Adequately address unexpected hazards or conditions encountered during environmental restoration, waste management, and decontamination's and decommissioning activities. In the event unanticipated hazards or conditions are encountered, the project activities will pause to assess the potential hazard or condition. The potential hazard or condition will be evaluated to determine the severity or significance of the hazard or condition and whether the existing project controls are sufficient to address the hazard or conditions. Based on this initial evaluation, a determination will be made whether to proceed with the controls currently in place; segregate the condition or hazard from the project activity, if this can be done safely; or curtail operations to address the unexpected hazard or condition. Concurrence to proceed down the selected path must be obtained from the respective RMRS Vice President or their designee.

In addition RMRS will:

12. Require air sampling to be performed in occupied areas where, under typical conditions, an individual is likely to receive an annual intake in excess of 2 percent of the specified derived air

concentration. This is equivalent to 40 DAC-hour exposure in one year and a CEDE of 100 mrem.

13. Require that continuous air monitors (CAMs) be used (10 CFR 835.403(a)(2)) in normally occupied areas where an individual is likely to be exposed to airborne radioactivity concentrations in excess of the DAC, as specified in Appendix A of Part 835, and where the need exists to alert individuals to unexpected increases in airborne radioactivity levels.
14. Be able to demonstrate that the sampling technique in use is capable of detecting and evaluating the level of concentration of airborne DOE radioactive material at work locations, as required by 10 CFR 835.403(a)(1). Naturally occurring radioactive isotopes, specifically Radon, will be evaluated and discriminated against using formal written guidance provided in the form of a procedure, shift order, work instructions, etc.
15. Use site-specific temporal and spatial averaging techniques in determining the requirements for air monitoring.
16. Make every effort to acquire and analyze air samples using the most representative and accurate techniques available. The method used must be appropriate for the existing environmental conditions and will consider the radioactive materials source terms(s), the release potential of the source term(s), and the containment of the source term(s).
17. Evaluate the need for containment for outdoor work if the following conditions are exceeded:
 - a) an individual is likely to be exposed to an airborne radioactivity concentration in excess of the 10% of the DAC, as specified in the Appendix A of Part 835.
 - b) removable contamination levels exceed 10,000 dpm alpha or 100,000 dpm beta.
18. Ensure that Soil Contamination Areas (SCAs) are posted in accordance with the RadCon Manual prior to performing any work in suspect areas. A SCA shall be posted as a Contamination Area or a High Contamination Area when monitoring shows that radioactive material contamination can be transferred from the area at levels greater than those specified for removable contamination as defined by Appendix D of 10 CFR 835 {10 CFR 835.603(e) and (f) and RCM 235.1}. It is not necessary to erect a Radiological Buffer Area or a physical barrier around the boundary of a SCA unless survey results suggest that contamination can be spread outside the area.